

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

<b>IN RE:</b>  <b>Everett Lee Ferguson, Debtor.</b>  <b>Nationstar Mortgage LLC D/B/A Champion Mortgage Company, Movant</b>  <b>v.</b>  <b>Everett Lee Ferguson Debtor/Respondent</b>  <b>Charles J DeHart, III, Esquire Trustee/Respondent.</b>	<b>CHAPTER.: 13</b>  <b>CASE NO.: 1:17-bk-01190-HWV</b>  <b>Hearing Date: December 14, 2021</b> <b>Hearing Time: 9:30 a.m.</b> <b>Hearing Location:</b> <b>Ronald Reagan Federal Building</b> <b>228 Walnut Street</b> <b>Harrisburg, PA 17101</b>
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**NATIONSTAR MORTGAGE LLC D/B/A CHAMPTION MORTGAGE COMPANY'S  
RESPONSE TO DEBTOR(S)' MOTION TO REIMPOSE AUTOMATIC STAY**

**COMES NOW**, Nationstar Mortgage LLC d/b/a Champion Mortgage Company ("Secured Creditor"), by and through undersigned counsel, hereby files its Response to Debtor's Motion to Reimpose Automatic Stay and, in support thereof, states as follows:

1. Secured Creditor holds a mortgage on the property located at 2154 Sollenberger Rd Chambersburg Pennsylvania 17202 ("Property").
2. On March 28, 2017, Debtor filed a Voluntary Chapter 13 Bankruptcy Petition.
3. On August 19, 2019, Debtor filed a Motion to Reimpose stay as to Nationstar Mortgage LLC d/b/a Champion Mortgage Company.
4. On December 9, 2019, Secured Creditor filed a Motion for Relief from the Automatic Stay (DE #35).

5. On February 20, 2020, a Stipulation Resolving Motion for Relief from Stay was filed stating that "If Debtor defaulted on the Stipulation in two separate months then, if Debtor defaults a third time, Movant may file a Certification of Default without having to first send Debtor notice of default."
6. On December 14, 2020, Secured Creditor filed its Certificate of Default (DE#46).
7. On December 18, 2020, an Order Granting Motion for Relief from the Automatic Stay upon Certificate of Default was entered (DE #47).
8. On November 22, 2021, Debtor filed Motion to Reimpose Automatic Stay (DE # 50).
9. Upon review of internal records, Debtor currently owes Secured Creditor post-petition arrears in the sum of \$4,468.54 as of November 23, 2021.
10. Secured Creditor requests the Automatic Stay not be reinstated until the Debtor's post-petition arrearage is fully cured.
11. Secured Creditor reserves the right to amend and or supplement this response prior to the hearing.

**WHEREFORE,** Secured Creditor respectfully requests entry of an order denying Debtor's Motion to Reimpose the Automatic Stay as to Secured Creditor and all further relief this Court deems just and proper.

Date: December 2, 2021

**Robertson, Anschutz, Schneid, Crane & Partners, PLLC**

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10700 Abbott's Bridge Rd., Suite 170  
Duluth, GA 30097

Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on December 3, 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Everett Lee Ferguson  
2154 Sollenberger Road  
Chambersburg, PA 17202

Paul Donald Murphy-Ahles  
Dethlefs Pykosh & Murphy  
2132 Market Street  
Camp Hill, PA 17011

Jack N Zaharopoulos (Trustee)  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

United States Trustee  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101

**Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC**

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By: /s/ Charles G. Wohlrab

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